

**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION**

KATRINA MACKLEY, as next friend for E.M.,  
a minor,

Plaintiff,

v.

MASON PUBLIC SCHOOL DISTRICT; LANCE  
DELBRIDGE; NICHOLAS TOODZIO; BARB  
BYRUM and BRAD DELANEY, individually,

Defendants.

Case No. 1:24-cv-00076-RJJ-SJB

Hon. Robert J. Jonker

Mag. Sally J. Berens

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**NON-PARTY B.D.'S MOTION TO QUASH  
PURSUANT TO RULE 45(d)(3)**

Non-party B.D. hereby moves to quash the deposition subpoena issued to him by Plaintiff in this matter under Federal Rule of Civil Procedure 45(d)(3) and for an award of attorney's fees under Federal Rule of Civil Procedure 45(d)(1) for the reasons and based on the law set forth in the accompany brief. As set forth more fully in the accompanying brief and Local Rule 7.1(d) certification, counsel for B.D. conferred with counsel for Plaintiff on three occasions in an effort to obtain concurrence. Plaintiff does not concur in this motion.

Date: November 8, 2024

By: \_\_\_\_\_s/Uri Abt

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